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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NELSON VASQUEZ, individually and
as successor-in-interest to Decedent,
Oscar Vasquez Lopez; DAYLIN
VASQUEZ, individually and as
successor-in-interest to Decedent, Oscar
Vasquez Lopez; LUSSY VASQUEZ,
individually and as successor-in-interest
to Decedent, Oscar Vasquez Lopez;
OSCAR VASQUEZ, individually and
as successor-in-interest to Decedent,
Oscar Vasquez Lopez; K.V., by and
through her guardian ad litem, Daylin
Vasquez, individually and as successor-
in-interest to Decedent, Oscar Vasquez
Lopez; A.V., by and through his
guardian ad litem, Daylin Vasquez,
individually and as successor-in-interest
to Decedent, Oscar Vasquez Lopez; and
JOSE VASQUEZ LOPEZ, individually,

Plaintiffs,

v.

CITY OF LOS ANGELES; and DOES
1 through 10, inclusive,

Defendants.

Case No. 8:24-cv-02421-FLA-JDE

*Hon. Fernando L. Aenlle-Rocha
Hon. Mag. Judge John D. Early*

**JOINT STIPULATION TO ALLOW
PLAINTIFFS TO AMEND
COMPLAINT TO NAME THE
OFFICER WHO USED DEADLY
FORCE IN PLACE OF DOE
DEFENDANT 1**

*[Proposed Order filed concurrently
herewith]*

1 **TO THIS HONORABLE COURT:**

2 **IT IS HEREBY STIPULATED** by and between Plaintiffs NELSON
3 VASQUEZ, DAYLIN VASQUEZ, LUSSY VASQUEZ, OSCAR VASQUEZ, K.V.,
4 A.V., and JOSE VASQUEZ LOPEZ, and Defendant CITY OF LOS ANGELES (“the
5 Parties”), by and through their respective attorneys of record, as follows:

- 6 1. Plaintiffs filed their Complaint on November 6, 2024. [Dkt. 1.] At the time
7 of the filing of their Complaint, Plaintiffs were genuinely ignorant of the
8 names of the City of Los Angeles Police Department employees and/or
9 individuals who used force during the incident giving rise to this lawsuit.
10 Subsequently, through discovery, Plaintiffs have discovered information
11 that Officer Sean Steelmon is the City of Los Angeles Police Department
12 employee who discharged his firearm during the incident giving rise to this
13 lawsuit.
- 14 2. The Parties agree that Plaintiffs may file an amended complaint for the
15 purpose of naming Officer Sean Steelmon as an individual defendant, in
16 lieu of the current fictitiously named defendant “Doe 1,” and identifying
17 the force he used.
- 18 3. A copy of Plaintiffs’ proposed First Amended Complaint is attached hereto
19 as “Exhibit A.”
- 20 4. Counsel for the City of Los Angeles agrees to accept service of the First
21 Amended Complaint on behalf of the City of Los Angeles and Sean
22 Steelmon.
- 23 5. The Parties agree that Plaintiffs shall have 7 days to file their First
24 Amended Complaint after the Court grants them leave, and that Defendant
25 City of Los Angeles shall have 21 days thereafter to file a responsive
26 pleading.

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1 THEREFORE, and based on the foregoing, the Parties hereby stipulate and
2 jointly request an order granting Plaintiffs leave to file a First Amended Complaint
3 within 7 days of the Court's order, and requiring that Defendant City of Los Angeles
4 file a responsive pleading within 21 days thereafter.

5 **IT IS SO STIPULATED.**

6
7 DATED: April 1, 2025

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8
9 By: 

Dale K. Galipo
Benjamin S. Levine
Attorneys for Plaintiffs

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11
12 DATED: April 1, 2025

HYDEE FELDSTEIN SOTO, City Attorney
DENISE C. MILLS, Chief Deputy City Attorney
KATHLEEN KENEALY, Chief Assist. City Attorney
CORY M. BRENT, Sr. Assistant City Attorney

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15
16 By: 

Christian R. Bojorquez
Attorneys for Defendant City of Los Angeles